

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,

Defendants.

Civil Action No. 5:21-cv-844 (XR)  
(Consolidated Cases)

**UNOPPOSED MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

The United States respectfully moves for entry of the attached Stipulated Protective Order between Plaintiff United States of America and Defendants the State of Texas and Secretary of State John Scott (collectively, the “Parties”) under Federal Rule of Civil Procedure 26(c) and Local Rule CV-26. The Parties have met and conferred and anticipate production of sensitive, private, personal and confidential electronically stored information concerning non-party Texas residents in the course of this action. Moreover, the Parties will exchange documents of a sensitive technical nature related to the aforementioned electronically stored information that is not generally known to others or the public and that is not generally revealed to third parties, including, for example, data dictionaries, user manuals, and other similar information.

Good cause exists to enter the Stipulated Protective Order to expedite discovery, protect sensitive and confidential information, enable the parties to prepare for dispositive motions and trial, and address the handling of confidential material during and after the conclusion of this litigation. The Parties have stipulated to entry of the Protective Order, and Defendants do not

oppose this motion for entry. Accordingly, the United States respectfully requests entry of the Stipulated Protective Order.

DATE: December 22, 2021

Respectfully submitted,

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/s/ Michael E. Stewart

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**CERTIFICATE OF CONFERRAL**

Pursuant to Local Rule CV-7(G), I hereby certify that on December 16, 2021, my co-counsel and I met and conferred with counsel for Defendants the State of Texas and Secretary of State John Scott regarding this request. Defendants do not object to entry of the Stipulated Protective Order.

/s/ Michael E. Stewart

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 22, 2021, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Michael E. Stewart

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